Lower Willamette Group
Co-Chairperson: Bob Wyatt, NW Natural
Co-Chairperson: Jim McKenna, Port of Portland

October 26, 2005

Chip Humphrey
Remedial Project Manager
U.S. Environmental Protection Agency
811 S.W. Sixth Avenue, 3rd Floor
Portland, OR 97204

Eric Blischke
Remedial Project Manager
U.S. Environmental Protection Agency
811 S.W. Sixth Avenue, 3rd Floor
Portland, OR 97204

Dear Messrs. Humphrey and Blischke,

On October 11, the Lower Willamette Group and EPA met to discuss EPA's September 26, 2005 letter directing changes to the LWG's Round 2B Subsurface Addendum to the Round 2 Field Sampling Plan dated August 22, 2005. We write to memorialize the agreements made during that meeting.

EPA requested three additional cores adjacent to Time Oil's NW Terminal to delineate petroleum and pentachlorophenol contamination off shore of Time Oil. During the meeting, we agreed that COIs, including petroleum-related COIs and pentachlorophenol, in upland groundwater at the Time Oil NW Terminal have been adequately delineated and are not reaching the river at levels that exceed screening levels. We agreed that PAHs and benzene were detected in Round 2A sediment cores in the vicinity of the NW Terminal, but that the detected concentrations were relatively low compared to concentrations detected throughout the Study Area. We agreed that pentachlorophenol was detected in only a single surface sample adjacent to the stormwater outfall at a concentration less than the laboratory reporting limit. For these reasons, EPA agreed that additional subsurface cores adjacent to the Time Oil facility are not necessary in Round 2B, and these cores will not be collected. The need for additional cores in this area will be assessed as part of the Round 3 data gaps evaluation.

EPA requested seven additional cores adjacent to the U.S. Moorings facility. EPA has advised us that these cores are necessary to investigate potential sources at U.S. Moorings that have not been evaluated under the intra-governmental agreement between the Corps of Engineers and EPA because of lack of funding, as well as to supplement the existing data on the nature and extent of sediment contamination. Consistent with the directed change, the LWG will collect this information. The LWG continues to request, however, that EPA take appropriate action to require upland property owners to perform source evaluation work prior to asking the LWG to undertake source investigations as part of the in-water RI/FS. At an appropriate time, the LWG will seek to recover these costs from the Corps of Engineers. EPA requested one additional core at Willamette Cove to characterize a petroleum "seep" area. LWG agrees with the placement of an in-water core adjacent to the area of an removal action performed by the Port and Metro in

October 2004 to address the presence of petroleum product in upland soil adjacent to the cove. However, we once again note that this is not and has never been a "seep". As described in Section 2.1 of the Round 2 Field Sampling Plan, a seep is "groundwater that may contain upland chemicals of interest (COIs) that is discharging to the surface above the water line." That was not the case in the removal action area at Willamette Cove. A sheen was observed on water in the cove in summer 2004 directly prior to the removal action. However, subsequent investigation demonstrated that the sheen was from the presence of petroleum product (characterized as Bunker C fuel) in sediments directly above and below the cove water line. It was not a groundwater discharge to surface water above the water line. The petroleum product was removed from upland soil in October 2004. Therefore, we respectfully request that this area not be referred to as a "seep" as it is confusing to all parties involved in the Portland Harbor study.

The LWG appreciates EPA's willingness to work with us in resolving these technical issues associated with the Round 2B coring program.

Sincerely,

The Lower Willamette Group

Robert J. Wyatt, R.G., co-chair

James J. McKenna, co-chair

Enclosure
cc: Lower Willamette Group
U.S. Army Corps of Engineers